

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:22-cv-24066-KMM

GRACE, INC., *et al.*,

Plaintiffs,

v.

CITY OF MIAMI,

Defendant.

JOINT MOTION FOR STAY AND CONTINUANCE

Plaintiffs, GRACE, Inc., Engage Miami, Inc., South Dade Branch of the NAACP, Miami-Dade Branch of the NAACP, Clarice Cooper, Yanelis Valdes, Jared Johnson, Alexandra Contreras and Steven Miro, and Defendant, City of Miami, (collectively, the “Parties”), and by and through the Parties’ undersigned counsel, hereby move for a stay and continuance in this matter and state as follows:

1. The Parties have been negotiating in good faith toward a mutually agreeable resolution to this case and related litigation and believe they may have reached that resolution, but require more time to finalize the details and bring the matter for consideration to the City Commission.

2. Based upon the current procedural requirements for notice and hearing, the Parties believe that the matter may be submitted to the City Commission for consideration at its May 9, 2024 meeting.

3. The Parties anticipate being able to provide the court with a status report following the May 9, 2024 Commission meeting.

4. To avoid further expenditure of time and resources of the Court and the Parties and to afford the ability to focus on finalizing the mutually agreeable resolution, the Parties jointly request this Court stay and continue the deadlines and hearing set in its recent order (ECF No. 186) until after the May 9, 2024 Commission Meeting.

WHEREFORE, the Parties, Plaintiffs, GRACE, Inc., Engage Miami, Inc., South Dade Branch of the NAACP, Miami-Dade Branch of the NAACP, Clarice Cooper, Yanelis Valdes, Jared Johnson, Alexandra Contreras and Steven Miro, and Defendant, City of Miami, respectfully request that this Court enter an Order granting this Joint Motion for Stay and Continuance in this action and continue all deadlines and hearings set forth in ECF No. 186 until sometime after May 9, 2024.

Respectfully submitted this 17th day of April 2024.

/s/ Caroline A. McNamara

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of April, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will serve this document on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ George T. Levesque
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